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April 14, 2025

**VIA ECF**

Hon. Judge Philip M. Halpern  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1950  
New York, New York 10007

Application granted. Deadlines extended  
as set forth herein.

SO ORDERED.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
April 15, 2025

Re: *Kristin Stein v. Town of Greenburgh*, et al. 21-cv-05673 (PMH)  
File No.: 11174.00005

Dear Judge Halpern:

We represent defendants the Town of Greenburgh, Greenburgh Police Chief Kobie Powell, and Captain Frank Farina (the “Defendants”). We write jointly on behalf of Defendants and Plaintiff to seek a brief extension of time regarding the filing of pretrial materials in this action. Specifically, the parties seek a one-week extension of time for the filing of the Joint Pretrial Order and voir dire from April 24, 2025 to May 1, 2025, and a further two week extension from that time, to May 15, 2025, for the filing of the proposed jury charge, verdict form, motions in limine, and any pre-trial memorandum under Rule 6(B)(i), (iii), and (iv).

In a March 25, 2025 Opinion and Order, this Court, *inter alia*, directed the parties to file all materials required by Rule 6(A) and 6(B) of the Court’s Individual Practices by April 24, 2025. The parties have been working diligently to meet the Court’s deadline, but seek a short extension of time as defense counsel had planned to be out-of-office over the Easter holiday prior to receipt

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of the Court's March 25, 2025 Order and the parties believe the additional time would help them better coordinate and prepare a joint charge and to help clarify the issues to be addressed by motions in limine. This letter is jointly submitted with the consent of Plaintiff's counsel.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ,  
EDELMAN & DICKER LLP

A handwritten signature in black ink that reads 'John M. Flannery'. The signature is written in a cursive, flowing style.

John M. Flannery

cc: Counsel of Record (via ECF)